

27 May 2003

Bill Pennington Project Manager Energy Efficiency and Demand Analysis Division California Energy Commission 1516 Ninth Street, MS-28 Sacramento, CA 95814

sent via email: bpenning@energy.state.ca.us

re: Comments on February draft, Title 24 revision, Section 143 (b) 1

Dear Mr. Pennington:

## **Comment**

This new section must be deleted. It is an arbitrary and capricious ban on several classes of proven roofing materials which is not justified by the purpose of this regulation.

## Rationale

Section 143 provides two methods of compliance within the prescriptive requirements for the building envelope: subsection (a) the "Envelope Component Approach," which is a conventional prescriptive approach, and subsection (b), the "Overall Envelope Approach."

The majority of metallic roof surfaces are de facto prohibited from meeting the requirements of 143 (a) because of their relatively low thermal emittances.

However, a building owner who wishes to use these materials -- e.g. for esthetics, because of their proven durability in a particular environment, etc. -- can still achieve <u>all</u> of the energy savings which are the purpose of this code by complying with the "Overall Envelope Approach" (new number 143(b) 2). [An obvious approach would be to increase the underlying roof insulation as permitted in equation 143-C (new number). ] A minor change may be required to Equation 143-E (new number), but this is trivial given the data which supports the existing building models.

This "overall Envelope Approach" method of compliance is permitted to every other building material. There is no justification for banning these materials from complying with the code requirements using this method.

If you have any questions, please call me at (323) 908-5279.

Paul A. Beemer Director, Legal & Technical Affairs Henry Company